

UNITED STATES DISTRICT COURT

Eastern

DISTRICT OF

Michigan

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

21345 31 Mile Rd
Ray Township, MI 48096*LEO RUDOLPH*

(Name and Address of Defendant)

FILE

JUN 11 5 2007

CLERK'S OFFICE
DETROIT

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Case Number:

07-30302

I, the undersigned complainant state that the following is true and correct to the best of my

knowledge and belief On or about June 1, 2007 in Macomb County, in
the Eastern District of Michigan defendant(s) did,

(Track Statutory Language of Offense)

Any person who employs, uses, persuades, induces, entices, or coerces any minor to engage in, or who has a minor assist any other person to engage in, or who transports any minor in interstate or foreign commerce, or in any Territory or Possession of the United States, with the intent that such minor engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct, shall be punished as provided under subsection

in violation of Title 18 United States Code, Section(s) 2251(a)

I further state that I am a(n) Special Agent and that this complaint is based on the
following facts:

See attached Affidavit

Continued on the attached sheet and made a part of this complaint:

Yes



No

*M. Daniel Ben-Meir*
Signature of Complainant

M. Daniel Ben-Meir

Printed Name of Complainant

Sworn to before me and signed in my presence,

June 15, 2007

Date

at

Detroit, MI

City and State

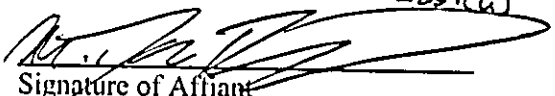
The Honorable United States Magistrate Judge
Name and Title of Judicial Officer

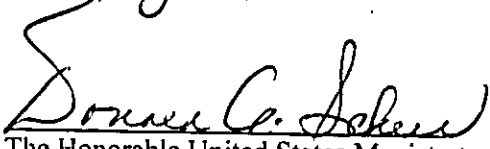
Donna C. Johnson
Signature of Judicial Officer

AFFIDAVIT

I, M. Daniel Ben-Meir, being duly sworn, depose and state:

1. I am a Special Agent with the Department of Homeland Security, Immigration and Customs Enforcement (ICE), assigned to the Special Agent in Charge in Detroit, MI. I have been so employed since June of 2004. As part of my duties as an ICE agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2252 and 2252A. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.
2. On June 15, 2007, a search warrant was obtained in the U.S. District court for the Eastern District of Michigan for 21345 31 Mile Rd, Ray Township, MI for evidence of violations of 18 USC 2252; child pornography. This is the residence of Leo RUDOLPH.
3. On June 15, 2007, Agents served the search warrant at said location and in doing so discovered that a young female who appeared to be the victim in images of child pornography which were previously received by ICE Agents in Detroit from ICE Agents in Oregon. Further investigation revealed that the young female (V-1) was in fact the same young girl from said images and that she is RUDOLPH's step-daughter. Also discovered in the house were objects that were included in the photos with V-1, specifically two comforters, a dog collar, a t-shirt, nylon ropes and the vehicle in which some of the photos were taken.
4. On June 15, 2007, ICE agents apprehended Leo RUDOLPH while he was de-boarding Air Tran Airway flight 165 from Orlando.
5. Based upon the aforementioned information there is probable cause to believe that Leo RUDOLPH did violate 18 USC 2252. ^{DB 6-15-07} _{2252(a)}


Signature of Affiant
M. Daniel Ben-Meir

*Subscribed and sworn before me this 15th day
of June, 2007*

The Honorable United States Magistrate Judge
Donald M. Scheer